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August 5, 2005
VIA HAND DELIVERY

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AUG 08 2005
PSC SC
DOCKETING DEPT.

Re: Docket No: 2005-110-W/S-Order No. 2005-210 *Petition of the Office of Regulatory Staff to Request Forfeiture of the Piney Grove Utilities, Inc. Bond and to Request Authority to Petition the Circuit Court for Appointment of a Receiver*

CT&R No: 1529.001\Piney Grove - ORS

8/8/05
tod

Dear Mr. Terreni:

Enclosed please find the original and eleven (11) copies of **Piney Grove Utilities, Inc.'s Supplemental Memorandum in Support of its Motion for Continuance**, in regard to the above-referenced matter.

Please file the original and ten copies and return a clocked copy to me via my courier.

With kind regards, I am

Sincerely yours,

CALLISON TIGHE & ROBINSON, LLC

Louis H. Lang

LHL/cs

Enclosures

cc: Benjamin P. Mustian, Esq. (w/ encl.)

Mr. D. Reece Williams, IV (w/ encl.)

1529.001\Piney Grove - ORS\Clerk PSC 005

RETURN DATE: N/A
SERVICE: Served DHEC 8/8/05
tod

**BEFORE THE PUBLIC SERVICE COMMISSION
FOR THE STATE OF SOUTH CAROLINA**

DOCKET NUMBER 2005-110-W/S-ORDER NO. 2005-210

**In Re: Petition of the Office of Regulatory Staff to)
Request Forfeiture of the Piney Grove)
Utilities, Inc bond and to Request Authority)
to Petition the Circuit Court for)
Appointment of a Receiver)**

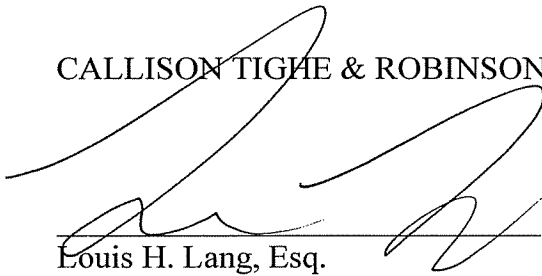
**SUPPLEMENTAL MEMORANDUM IN SUPPORT OF
MOTION FOR A CONTINUANCE**

Piney Grove Utilities, Inc. (Piney Grove), respectfully submits the following Supplemental Memorandum in Support of its Motion for Continuance.

In its Motion, Piney Grove made reference to what it was informed and believed to be ongoing negotiations between the City of Cayce and the Office of Regulatory Staff (ORS) concerning the elimination of Piney Grove's Lloydwood wastewater water facility discharge to Cayce. Attached to this Supplemental Memorandum, is a copy of a letter from Cayce received this date by counsel for Piney Grove which makes reference to those negotiations. The attached letter is in response to a letter from counsel for Piney Grove to Cayce dated July 28, 2005, a copy of which is included in the prefiled exhibits heretofore submitted by Piney Grove.

Based upon the foregoing, and those matters set forth in Piney Grove's Motion, Piney Grove would respectfully request that the hearing scheduled for August 9, 2005, be continued.

CALLISON TIGHE & ROBINSON, LLC



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Attorneys for Piney Grove Utilities, Inc.

Columbia, South Carolina

August 5, 2005

1529.001\Piney Grove - ORS\Supplement to Motion for Continuance

CERTIFICATE OF HAND DELIVERY

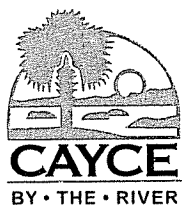
I, Louis H. Lang, hereby certify that I have caused to be hand delivered a copy of the above and foregoing to counsel of record in said proceedings to his office address with sufficient postage attached.

Benjamin P. Mustian, Esq.
Office of Regulatory Staff
1441 Main Street, Suite 300
Post Office Box 11263
Columbia, SC 29211

Columbia, S.C. this 5th day of August, 2005.



Louis H. Lang



CITY OF CAYCE

August 4, 2005

Mayor
Avery B. Wilkerson, Jr.

Mayor Pro-tem
Richard N. Myers

Council Members
James E. Jenkins
Kenneth D. Jumper
Robert E. Malpass

City Manager
John C. Sharpe

Public Safety
Charles E. McNair

Attorney Louis H. Lang
Callison Tighe & Robinson, LLC
1812 Lincoln Street
Columbia, South Carolina 29201

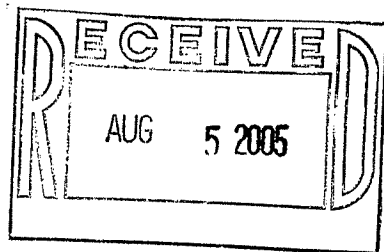
Re: Piney Grove Utilities, Inc.
Lloydwood Subdivision Wastewater System

Dear Mr. Lang:

I received a faxed copy of your letter dated July 28, 2005 in reference to the Lloydwood wastewater system. Staff discussed this issue with City Council at the Regular Council meeting held August 2, 2005.

Your letter offers to give or transfer, at no cost, the Lloydwood wastewater facility that Piney Grove Utilities, Inc. presently owns to the City of Cayce. At the request of DHEC and the Office of Regulatory Staff the city is considering your offer and the feasibility of constructing a sewer pump station, a sewer force main and gravity sewer mains that could be used to redirect the wastewater flow from the Lloydwood treatment plant into the city sewer system. The Lloydwood wastewater would then be transported through the city collection system to the city wastewater treatment plant where it would be treated. The city's engineer has been authorized to prepare estimated preliminary cost and project documents for such a project.

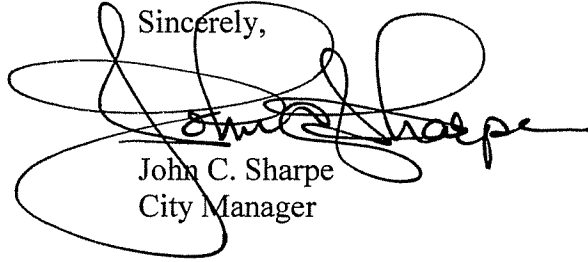
Prior to the city moving forward with such a project, the city would have to own the Lloydwood collection system as offered in your letter. However, the City of Cayce is not interested and will not accept ownership of any portion of the Lloydwood wastewater treatment plant/lagoon, the plant property, or assuming ownership of the facility's NPDES permit.



If the Lloydwood project becomes possible by meeting all city requirements, including that the city be made whole and does not incur construction costs that has to be passed to our ratepayers, it will become necessary for Piney Grove Utility, Inc. to transfer or deed the Lloydwood sewer collection system to the city.

Page 2
Attorney Louis H. Lang
August 4, 2005

We will be working with our County Councilman and State representatives for this area and with the Office of Regulatory Staff to see if additional grant funds are available for this project.

Sincerely,

John C. Sharpe
City Manager

JCS/

Cc: Mayor & Council
Frank Robinson, Director of Utilities
Danny Crowe, City Attorney
Representative Mac Toole
Councilman Todd Cullum
Jeff deBessonnet P.E., SCDHEC
Douglas Kinard P.E., SCDHEC
Willie Morgan P.E., SCORS
Mr. Reese Williams, IV